

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

WENDELL BEDFORD	:	CASE NO. C-I-01-861
	:	
Plaintiff,	:	Judge Beckwith
	:	Magistrate Judge David S. Perelman
vs.	:	
	:	
THE CINCINNATI GAS &	:	JOINT AFFIDAVIT
ELECTRIC COMPANY	:	OF SUSAN M. WOLFRAM
	:	<u>AND JILL T. O'SHEA, ESQ.</u>
Defendant.	:	
STATE OF OHIO)	
)ss.	
COUNTY OF HAMILTON)	

Come now affiants, Jill T. O'Shea, Esq. and Susan M. Wolfram, after being duly cautioned and sworn, state as follows:

1. That Jill T. O'Shea, Esq. is defense counsel in the above-captioned matter.
2. That Susan M. Wolfram is a paralegal that works in the legal department of Defendant, The Cincinnati Gas & Electric Company, and works on employment litigation matters involving Jill T. O'Shea.
3. That Susan M. Wolfram, paralegal, prepared an initial draft of Defendant, The Cincinnati Gas & Electric Company's Motions for Sanctions (Affidavit of Jill T. O'Shea, Esq. Attached Hereto) including work related to the attachments for a total of 1.0 hours.

4. That Jill T. O'Shea, Esq. spent .5 hours in the review and revision of Defendant, The Cincinnati Gas & Electric Company's, Second Motion to Compel (Affidavit of Jill T. O'Shea, Esq. Attached Hereto).

5. That Jill T. O'Shea, Esq. spent 2.0 hours in the review of Plaintiff Pro Se's Response and Objection to Defendant's Motion for Sanctions forwarded via facsimile on June 30, 2003 and in the preparation of the Reply Memorandum In Support of Second Motion for Sanctions and Response to Second Motion for Enlargement of Time (Joint Affidavit of Melissa Hogan and Jill T. O'Shea, Esq. Attached Hereto) filed on July 2, 2003.

6. That the 2.0 hours does NOT include the time spent in the preparation of the above pleading addressing the enlargement of time issue.

7. That a reasonable and customary billing rate for a paralegal performing paralegal work in employment litigation is \$90.00 an hour.

8. That a reasonable and customary billing rate for an attorney licensed for in excess of 17 years in the United States District Court for the Southern District of Ohio performing employment litigation is \$250.00 an hour.

9. That Defendant, The Cincinnati Gas & Electric Company, is not requesting the costs associated with the copying costs and certified mail and ordinary mail delivery service of Defendant, The Cincinnati Gas & Electric Company's Motions for Sanctions (Affidavit of Jill T. O'Shea, Esq. Attached Hereto) and Reply Memorandum In Support of Second Motion for Sanctions and Response to Second Motion for Enlargement of Time (Joint Affidavit of Melissa Hogan and Jill T. O'Shea, Esq. Attached Hereto)

10. That the total expenses and attorney's fees incurred in preparing and filing the motion for sanctions is in the amount of \$715.00.

11. That they have first-hand knowledge of the above.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Jill T. O'Shea
Jill T. O'Shea (0034692)

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Susan M. Wolfram
Susan M. Wolfram

NOTARY OF PUBLIC

Sworn to and subscribed in my presence this 18th day of February, 2004.

/s/ Melissa Manaugh Feldmeier
Notary Public

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to Wendell Bedford, 3377 Goldrush Court, Cincinnati, Ohio 45211, by certified and ordinary U.S. mail this 18th day of February, 2004.

/s/ Jill T. O'Shea
Jill T. O'Shea